

Hearing Date and Time: November 16, 2011 at 10:00 a.m. (Prevailing Eastern Time)
Objection Date and Time: November 9, 2011 at 4:00 p.m. (Prevailing Eastern Time)

REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
Eric A. Schaffer
Michael J. Venditto

*Counsel for BNY Mellon Corporate
Trustee Services Limited*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re: |) | |
| |) | Chapter 11 |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , |) | |
| |) | Case No. 08-13555 (JMP) |
| Debtors. |) | (Jointly Administered) |
| |) | |

**LIMITED OBJECTION AND JOINDER OF BNY MELLON CORPORATE TRUSTEE
SERVICES LIMITED IN OBJECTION OF THE DANTE NOTEHOLDERS TO THE
DEBTORS' ASSUMPTION OF CERTAIN DERIVATIVE CONTRACTS**

BNY Mellon Corporate Trustee Services Limited ("BNYM"), by its undersigned counsel,
hereby files its Limited Objection and Joinder of BNY Mellon Corporate Trustee Services
Limited in the Objection of the Dante Noteholders,¹ to the Debtors' Assumption of Certain
Derivative Contracts, and states as follows:

1. BNYM is successor trustee under a certain Principal Trust Deed, dated 10
October 2002, between Dante Finance Public Limited Company and J.P. Morgan Corporate

¹ The "Dante Noteholders" are: Belmont Park Investments Pty Ltd; Ambulance Victoria; Fire and
Emergency Services Superannuation Board; Belreef Holdings Pty Ltd; Broken Hill City Council; City of Swan;
Eurobodalla Shire Council; G & F Yukich Superannuation Pty Ltd; Gippsland Secured Investments Ltd; G.James
Australia Pty Ltd; G.James Superannuation Pty Ltd; Gosford City Council; Guyra Shire Council; Indian Pacific
Limited; Lifeplan Australia Friendly Society Limited; Newcastle City Council; Orient Holdings Pty Ltd; Panorama
Ridge Pty Ltd; Parkes Shire Council; Sashimi Investments Pty Ltd; Southern Finance Limited; Statewide Secured
Investments Ltd; The Cootharinga Society of North Queensland; and Wingecarribee Shire Council.

Trustee Services Limited (as amended and restated, the “Principal Trust Deed”) and certain Supplemental Trust Deeds entered into in accordance with the Principal Trust Deed (collectively, the “Trust Deed”), including those referenced specifically in the Dante Noteholders Objection (as defined below).²

2. On or about November 4, 2011, the Dante Noteholders filed their Limited Objection to the Debtors’ Assumption of Certain Derivative Contracts (the “Dante Objection”) [Docket No. 21633] in which they objected to assumption of certain derivative contracts.

3. At the direction of the Dante Noteholders given in accordance with the Trust Deed, the Trustee joins in the Dante Noteholders Objection and objects to confirmation of the Plan for the reasons set forth in the Dante Noteholders Objection and objects.

Dated: November 4, 2011
New York, New York

Respectfully submitted,

REED SMITH LLP

By: /s/ Michael J. Venditto
Michael J. Venditto
Eric A. Schaffer
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
Email: mvenditto@reedsmith.com
eschaffer@reedsmith.com

Counsel for BNY Mellon Corporate
Trustee Services Limited

² BNYM incorporates by reference the definitions used in the Dante Noteholders Objection.